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January 8, 2015

## FILED & SERVED ELECTRONICALLY

The Honorable Michael A. Hammer, U.S.M.J. United States District Court for the District of New Jersey Martin Luther King, Jr. Federal Building & Court House 50 Walnut Street, Newark, New Jersey 07102

Re: United States v. Keila Ravelo

Case No.: 14-6800-01

Dear Judge Hammer:

As Your Honor may have noticed, this Firm has entered an appearance as co-counsel for Defendant Keila Ravelo in the above-referenced matter. Enclosed is a proposed Consent Order amending the December 22, 2014 Order setting the conditions of Ms. Ravelo's release. With the consent of Assistant U.S. Attorney Andrew Kogan, the enclosed Order permits Ms. Ravelo to regularly travel to Manhattan, New York City in order to tend to her personal and business affairs. It also permits Ms. Ravelo to visit her children who attend school at the IMG Academy in Bradenton, Florida on a monthly basis, upon an appropriate showing to, and the approval of, the United States Office of Pretrial Services. In light of the family's recent change of circumstances, including Ms. Ravelo's indictment, these visits are especially important so that she can support her children during this difficult time. As Your Honor will note in the proposed Order, Ms. Ravelo plans to visit her children this Saturday, January 10, 2015, returning Wednesday, January 14, 2015.

In exchange for these terms, the United States has proposed to increase the amount of Ms. Ravelo's bail bond by \$250,000, to be fixed at \$750,000. Although no further security is required, the bond is to be co-signed by Ms. Ravelo and her adult son, Eric Feliz, within one week.

Because Ms. Ravelo's travel is imminent, we would very much appreciate Your Honor's prompt consideration of this matter. Of course, if Your Honor has any questions or concerns about the enclosed Order, please do not hesitate to contact me, or Mr. Kogan, with whom I have worked on these issues.

## GIBBONS P.C.

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Thank you very much for your kind attention to this case.

Respectfully submitted,

s/Lawrence S. Lustberg Lawrence S. Lustberg GIBBONS, P.C. One Gateway Center Newark, New Jersey 07102-5310 (973) 596-4500

cc: Andrew Kogan, Assistant U.S. Attorney (via ECF)
Aidan P. O'Connor, Esq. (via ECF)
Steven H. Sadow, Esq.